

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

MARK CARMAN, Individually and on  
Behalf of All Others Similarly Situated

Plaintiff,

V.

PORTSMOUTH REDEVELOPMENT  
AND HOUSING AUTHORITY,

Defendant.

Case No: 2:22-cv-313-AWA-RJK

**PLAINTIFF'S SUPPLEMENTAL DISCLOSURES**  
**PURSUANT TO RULE 26(a)(1)**

Plaintiff Mark Carman, individually and on behalf of all others similarly situated, by and through his attorney Sean Short of the Sanford Law Firm, PLLC, hereby submits the following Supplemental Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):

**(3) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Computations of unpaid wages are attached. The categories of damages are as follows:

Unpaid back wages, including overtime wages; pre-judgment interest; post-judgment interest; liquidated damages; court costs; and attorney's fees. Please see enclosed.

Respectfully submitted,

**MARK CARMAN, Individually  
and on Behalf of All Others  
Similarly Situated, PLAINTIFF**

/s/ Sean Short

Sean Short (Ark. Bar No. 2015079)  
SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040  
[sean@sanfordlawfirm.com](mailto:sean@sanfordlawfirm.com)

**CERTIFICATE OF SERVICE**

I, Sean Short, do hereby certify that a true and correct copy of the foregoing was served  
via email on May 30, 2023, to the attorneys listed below:

Susan Childers North, Esq.  
Jonathan W. Gonzalez, Esq.  
Gordon Rees Scully Mansukhani, LLP  
5425 Discovery Park Boulevard Suite 200  
Williamsburg, VA 23188  
[snorth@grsm.com](mailto:snorth@grsm.com)  
[jwgonzalez@grsm.com](mailto:jwgonzalez@grsm.com)

/s/ Sean Short  
Sean Short

**Mark Carman**

<b>Week Ending</b>	<b>Total Hours</b>	<b>Pay Rate</b>	<b>OT Hours</b>	<b>OT Premium</b>	<b>Damages</b>	<b>Liquidated</b>
6/11/21	27.5	\$ 19.00	0	\$ 9.50	\$ -	\$ -
6/18/21	21	\$ 19.00	0	\$ 9.50	\$ -	\$ -
6/25/21	48	\$ 21.00	8	\$ 10.50	\$ 84.00	\$ 168.00
7/2/21	39	\$ 21.00	0	\$ 10.50	\$ -	\$ -
7/9/21	33	\$ 21.00	0	\$ 10.50	\$ -	\$ -
7/16/21	29	\$ 22.00	0	\$ 11.00	\$ -	\$ -
7/23/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
7/30/21	21	\$ 22.00	0	\$ 11.00	\$ -	\$ -
8/6/21	35	\$ 22.00	0	\$ 11.00	\$ -	\$ -
8/13/21	33	\$ 22.00	0	\$ 11.00	\$ -	\$ -
8/20/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
8/27/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/3/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/10/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/17/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/24/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
10/1/21	62.5	\$ 22.00	22.5	\$ 11.00	\$ 247.50	\$ 495.00
10/8/21	70	\$ 22.00	30	\$ 11.00	\$ 330.00	\$ 660.00
10/15/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
10/22/21	70	\$ 22.00	30	\$ 11.00	\$ 330.00	\$ 660.00
10/29/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
11/5/21	49	\$ 22.00	9	\$ 11.00	\$ 99.00	\$ 198.00
11/12/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
11/19/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
11/26/21	49	\$ 22.00	9	\$ 11.00	\$ 99.00	\$ 198.00
12/3/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
12/10/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
12/17/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
12/24/21	65	\$ 22.00	25	\$ 11.00	\$ 275.00	\$ 550.00
12/31/21	54	\$ 22.00	14	\$ 11.00	\$ 154.00	\$ 308.00
					<b>\$ 4,302.50</b>	<b>\$ 8,605.00</b>

<b>Week Ending</b>	<b>Total Hours</b>	<b>Salary</b>	<b>Regular Rate</b>	<b>OT Premium</b>	<b>OT Hours</b>	<b>Damages</b>	<b>Liquidated</b>
3/11/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
3/25/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
4/1/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
4/8/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
4/15/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
4/22/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
5/6/22	120	\$ 1,870.00	\$ 15.58	\$ 7.79	40	\$ 311.67	\$ 623.33
						<b>\$ 2,181.67</b>	<b>\$ 4,363.33</b>

**Marc Gonzalez**

<b>Week Ending</b>	<b>Total Hours</b>	<b>Pay Rate</b>	<b>OT Hours</b>	<b>OT Premium</b>	<b>Damages</b>	<b>Liquidated</b>
6/11/21	32	\$ 19.00	0	\$ 9.50	\$ -	\$ -
6/18/21	48	\$ 19.00	8	\$ 9.50	\$ 76.00	\$ 152.00
6/25/21	34	\$ 21.00	0	\$ 10.50	\$ -	\$ -
7/2/21	65	\$ 21.00	25	\$ 10.50	\$ 262.50	\$ 525.00
7/9/21	52	\$ 22.00	12	\$ 11.00	\$ 132.00	\$ 264.00
7/16/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
7/23/21	64	\$ 22.00	24	\$ 11.00	\$ 264.00	\$ 528.00
7/30/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
8/6/21	65	\$ 22.00	25	\$ 11.00	\$ 275.00	\$ 550.00
8/13/21	70	\$ 22.00	30	\$ 11.00	\$ 330.00	\$ 660.00
8/20/21	78	\$ 22.00	38	\$ 11.00	\$ 418.00	\$ 836.00
8/27/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/3/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/10/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
9/17/21	64	\$ 22.00	24	\$ 11.00	\$ 264.00	\$ 528.00
9/24/21	64	\$ 22.00	24	\$ 11.00	\$ 264.00	\$ 528.00
10/1/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
10/8/21	48	\$ 22.00	8	\$ 11.00	\$ 88.00	\$ 176.00
10/15/21	70	\$ 22.00	30	\$ 11.00	\$ 330.00	\$ 660.00
10/22/21	60	\$ 22.00	20	\$ 11.00	\$ 220.00	\$ 440.00
10/29/21	40	\$ 22.00	0	\$ 11.00	\$ -	\$ -
11/5/21	46	\$ 22.00	6	\$ 11.00	\$ 66.00	\$ 132.00
11/12/21	28	\$ 22.00	0	\$ 11.00	\$ -	\$ -
11/19/21	48	\$ 22.00	8	\$ 11.00	\$ 88.00	\$ 176.00
11/26/21	18	\$ 22.00	0	\$ 11.00	\$ -	\$ -
12/3/21	51	\$ 22.00	11	\$ 11.00	\$ 121.00	\$ 242.00
12/10/21	39	\$ 22.00	0	\$ 11.00	\$ -	\$ -
12/17/21	49	\$ 22.00	9	\$ 11.00	\$ 99.00	\$ 198.00
12/24/21	46	\$ 22.00	6	\$ 11.00	\$ 66.00	\$ 132.00
12/31/21	56	\$ 22.00	16	\$ 11.00	\$ 176.00	\$ 352.00
					<b>\$ 4,859.50</b>	<b>\$ 9,719.00</b>